

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN) (and member case *Burlingame v. Bin Laden, et al.*, 02-cv-7230)

STATE OF NEW YORK     )  
COUNTY OF NASSAU     )

WILLIAM DOWDELL, hereby states under penalty of perjury that:

1. I am a resident citizen of the state of New York, born on [REDACTED] 1970, and I am the surviving stepson of Brian Magee who was killed in the September 11th attacks.
2. My mother, Valerie Magee, was married to Brian Magee on August 7, 1983.
3. My mother, two brothers and I lived with my stepfather from 1983, when I was 13 years old, until I moved out at the age of 25.
4. My mother and biological father were divorced in 1977. Unfortunately, my biological father was an alcoholic and was absent after the divorce. I have not spoken to my biological father since 1987. Although he was supposed to pay child support and had visitation rights, he rarely visited, and my mother was continuously fighting for him to provide financial support.
5. Brian Magee was my father in all respects other than biology. From the moment Brian moved in he immediately took on the role as father to me and my brothers. My stepfather did all the things that a natural father would do. He provided me with financial and emotional support, teaching me, guiding me and providing all the care, companionship and nurturing that a

father would give his son. If I did something wrong or wasn't working to my full potential, both my mom and Brian would present a united front in their discipline and encouragement.

6. We always spent holidays as a family. On Christmas Eve we would go to Brian's brother's house and we were always treated as if we were Brian's biological children. His siblings quickly became our aunts and uncles, their children our cousins and we were always included in big family functions. We hosted Christmas at our house and spent it with all of our extended family.

7. Brian helped me pay tuition to attend Catholic high school at Holy Cross and after I graduated, he also helped me pay for college. Before my mother married Brian, finances were difficult, my mother struggled to keep things afloat as a single mother of three young children. We almost lost our house before Brian came into the picture. Brian lived up to every expectation of a father, he made our life feel "normal" and made sure we knew we would always have somewhere to come home to.

8. We took many family vacations together, we traveled to St. Thomas after my parents were married. We took trips every summer to Montauk and went to Florida together as a family almost every winter.

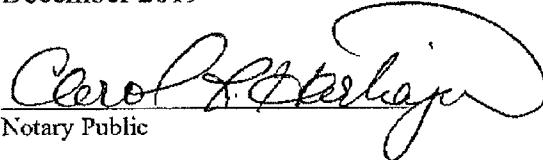
9. Brian shared his love for motorcycles and cars with me and my brothers. He showed us how to be D-I-Y mechanics, always helped us when we were buying a new car and the four of us would spend weekends working together in the driveway on one of our cars. We all came to love his hobby and adopt it as our own.

10. My stepfather was present for everything he could be, he was on the sidelines for my games, drove me to and from practice, attended parent teacher conferences and celebrated my achievements. He was my father.

11. I have been deeply affected by my stepfather's death and I respectfully request that the Court deem me the "functional equivalent" of Brian Magee's son for purposes of my claim for solatium damages against the Republic of Iran resulting from his death.

  
WILLIAM DOWDELL

Sworn to before me this 20 of  
December 2019

  
Notary Public

CAROL R HARBAJAN  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01HA6281716  
Qualified in Queens County  
My Commission Expires 05-13-2021